

REMARKS

Initially, Applicants thank the Examiner for the courtesies extended during the recent telephonic interview held on June 28. The claim amendments and arguments submitted in this paper are consistent with the amendments and arguments presented during the course of the interview. Applicants are submitting this Supplemental Amendment in accordance with Examiner's indication that such a submission would be appropriate in this situation, and is permissible as indicated in MPEP 714.03(a).

The Final Office Action mailed April 16, 2007 considered claims 1-18, 21-24, and 26-41. Claims 1-11, 15-18, 23, 26-27, and 32-38 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Serlet et al.* (US 6,842,770) hereinafter *Serlet* and *Doragh* (US 5,341,499) hereinafter *Doragh*.¹²

By this amendment claims 1, 16 and 33 have been amended.³ Claims 1-18, 21-24, and 26-41 are pending, of which claims 1, 15, 16, 32 and 33 are the only independent claims at issue.

The present invention is generally directed to automatically and transparently handling WebDAV server and file access requests. For example, claim 1 defines receiving at an I/O manager a WebDAV I/O request initiated from an application program, wherein the request indicates a path and filename of a remote file accessible via WebDAV. Next, claim 1 defines polling available redirectors to determine which redirectors are configured to handle the application program's WebDAV I/O file request, each redirector configured to receive and redirect WebDAV file requests to corresponding WebDAV server computer systems that store the remote files. Next, claim 1 defines receiving responses from a plurality of polled redirectors, each responding redirector being capable of redirecting the received WebDAV I/O request.

¹ Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

² Other rejections include the following: Claim 24 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Serlet* and *Doragh* as applied to claim 16 above, and further in view of *Charisius et al.* (US 2002/0078432) hereinafter *Charisius*. Claims 36 and 37 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Serlet* and *Doragh* as applied to claim 33 above, and further in view of *French* (US 6,654,794) hereinafter *French*. Claims 12-14, 28-30, and 39-41 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Serlet* and *Doragh* as applied to claims 1 and 16 above, and further in view of *Prust* (US 6,714,968) hereinafter *Prust*. Claim 31 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Serlet*, *Doragh*, and *Prust*.

³ Support for the amendments to the claims are found throughout the specification and previously presented claims, including but not limited to paragraphs [0034]-[0037], [0103] and Figure 2.

Next, claim 1 defines determining from a stored priority order which of the plurality of responding redirectors has precedence to handle the WebDAV I/O request. Next, claim 1 defines, based on the determination, requesting a local file system of the redirector determined to have precedence to create the file in response to the WebDAV I/O request, downloading the file to a local cache of the redirector's file system, and returning a file handle corresponding to the file in the local cache to the application program. Next, claim 1 defines providing access to the file in the local cache of the file system via the file handle. Lastly, claim 1 defines receiving a request to close the file via the file handle, and when received, uploading the file from the local cache of the file system to the WebDAV server.

Claim 15 is a computer program product claim corresponding to claim 1. Claim 16 is a method claim similar to claim 1, more specifically related to using a URI in the I/O request. Claim 32 is a computer program product claim corresponding to claim 16. Claim 33 is a system claim similar to claim 1.

Applicants respectfully submit that the cited art of record does not anticipate or otherwise render the amended claims unpatentable for at least the reason that the cited art does not disclose, suggest, or enable each and every element of these claims.

Serlet describes a system and method by which computer users can seamlessly access remote files using any application with a well-known protocol (Col. 2:51-54). *Serlet* describes a seamless files system (SFS) that allows access to remote files, including WebDAV files, in the same manner as accessing local files without requiring any changes to the program's method of communication with the file system (Col. 2:54-59). SFS is an operating system (OS) extension that forwards remote file requests to a network access program (NAP). The NAP reformats the request to a common protocol (Col. 2:60-67). The remote file system may be cached in the local file system, after which the two file systems are synchronized (Col. 3:10-16).

Doragh describes a method and system for processing multiple server requests using different types of servers without having to load a different file system driver (FSD) (Abs.). Whereas a user would normally have to reboot to load a different FSD, *Doragh* allows two FSD's to be used simultaneously. When a user requests a file located on a remote server, *Doragh* automatically polls each loaded FSD to determine which FSD manages the remote server containing the requested file (Col. 2:25-30). The polling is performed sequentially, one by one down the list of loaded FSD's, until the correct FSD that contains the requested file is found

(Col. 5:28-67). Only the server that contains the requested remote file responds affirmatively to the poll.

Neither *Serlet* nor *Doragh* teaches or suggests receiving responses from a plurality of polled redirectors, each responding redirector being capable of redirecting the received WebDAV I/O request, as recited in claim 1. Furthermore, neither *Serlet* nor *Doragh* teaches or suggests determining from a stored priority order which of the plurality of responding redirectors has precedence to handle the WebDAV I/O request and based on the determination, requesting a local file system of the redirector determined to have precedence to create the file in response to the WebDAV I/O request, downloading the file to a local cache of the redirector's file system, and returning a file handle corresponding to the file in the local cache to the application program, as recited in claim 1. At least for any of these reasons, claim 1 patentably defines over the art of record. At least for any of these reasons, claims 15, 16, 32 and 33 also patentably define over the art of record. Since each of the dependent claims depend from one of claims 1, 15, 16, 32 and 33, each of the dependent claims also patentably define over the art of record for at least either of the same reasons.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at 801-533-9800.

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Respectfully submitted,

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